

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Andrew I. Kossman : CASE NO 16-14493 ELF
Debtor : Chapter 13

Wilmington Savings Fund Society, FSB, d/b/a :
Christiana Trust, not individually but as trustee for :
Pretium Mortgage Acquisition Trust :
Movant :

v. :

Andrew I. Kossman :
Debtor :

and :

William C. Miller, Esq. :
Trustee :

**RESPONSE OF DEBTOR TO
MOTION OF WILMINGTON SAVINGS FUND SOCIETY, FSB, D/B/A CHRISTIANA
TRUST, NOT INDIVIDUALLY BUT AS TRUSTEE FOR PRETIUM MORTGAGE
ACQUISITION TRUST
FOR RELIEF FROM THE AUTOMATIC STAY
UNDER SECTION 362**

Debtor, Andrew Kossman, by his attorney John M. Kenney, Esquire, hereby responds to the Motion of Wilmington Savings Fund Society, FSB, for Relief from the Automatic Stay, and responds accordingly as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted
6. Denied. It is denied that the Debtor has failed to make the monthly payments for the alleged period.
7. Denied.

8. Denied. It is denied that the total arrearage is the amount alleged in paragraph 8.

9. Denied. It is denied that the Movant is entitled to relief from stay for cause.

10. Denied.

WHEREFORE, Debtor, Andrew I. Kossman, hereby prays this court would deny and dismiss the Motion of Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, for Relief from the automatic stay.

Date: January 24, 2018

/s/ John M. Kenney
JOHN M. KENNEY, ESQUIRE
Attorney for debtor
308 N. Oxford Valley Road
Fairless Hills, PA 19030